

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ELIZABETH JORDAN,

Plaintiff,

v.

CHICAGO HOUSING AUTHORITY,

Defendant.

Case No. 1:24-cv-01826

**MOTION FOR ENTRY OF CLERK’S DEFAULT**

**NOW COMES** ELIZABETH JORDAN (“Plaintiff”), and pursuant to Fed. R. Civ. P. 55(a), seeking entry of a Clerk’s default against CHICAGO HOUSING AUTHORITY (“Defendant”), and in support thereof, stating as follows:

1. On March 4, 2024, Plaintiff filed the instant action against Defendant seeking redress for violations of the Family and Medical Leave Act of 1993, 29 U.S.C. § 2601 *et seq.* (“FMLA”), and the American with Disabilities Act of 1990 (“ADA”), 42 U.S.C. § 12101 *et seq.* [Dkt. 1]

2. On March 28, 2024, Defendant was served with Plaintiff’s complaint via service on Defendant’s registered agent in Chicago, Illinois. [Dkt. 5]

3. Defendant’s responsive pleading was due on or before April 18, 2024.

4. Despite being duly served with Plaintiff’s complaint, Defendant has failed to appear or otherwise respond to Plaintiff’s complaint.

5. Pursuant to Fed. R. Civ. P. 55(a), Plaintiff is seeking the entry of a Clerk’s default as a result of Defendant’s failure to respond to Plaintiff’s complaint.

**WHEREFORE**, Plaintiff respectfully requests the entry of Clerk's default against Defendant, and for any further relief the Court deems just and proper.

Dated: April 30, 2024

Respectfully submitted,

**/s/Alexander J. Taylor, Esq.**

**Alexander J. Taylor, Esq.**

**Mohammed O. Badwan, Esq.**

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2024, I electronically filed the foregoing with the Clerk of the Court for the Northern District of Illinois by using the CM/ECF system and served the Defendant via USPS Priority Mail, postage prepaid, at Defendant's registered agent's address:

**CHICAGO HOUSING AUTHORITY**  
4429 N. CLIFTON AVE.  
CHICAGO, IL 60640-5603

**/s/Alexander J. Taylor, Esq.**  
**Alexander J. Taylor, Esq.**